

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

SIOUX STEEL COMPANY, a South Dakota corporation,)	CIV. 15-4136
)	
)	
Plaintiff,)	
)	AFFIDAVIT OF G. VERNE GOODSELL IN
vs.)	SUPPORT OF MOTION TO STRIKE
)	DEFENDANT'S EXPERT JOHN W.
KC ENGINEERING, P.C., an Iowa corporation,)	CARSON
)	
Defendant.)	
)	
State of South Dakota)	
) ss.	
County of Pennington)	

G. Verne Goodsell, being first duly sworn upon his oath deposes and states as follows:

1. I am one of the attorneys for the named Plaintiff in the above-titled action.
2. Attached hereto as "Exhibit A" is a true and correct copy of the Expert Report of John W. Carson, Ph.D., November 21, 2016 ("Carson Report"), pg. 4.
3. Attached hereto as "Exhibit B" is a true and correct copy of the J & J Phone Log.
4. Attached hereto as "Exhibit C" is a true and correct copy of the Retention Letter, July 30, 2012.
5. Attached hereto as "Exhibit D" is a true and correct copy of the KC Letter, August 28, 2012.
6. Attached hereto as "Exhibit E" is a true and correct copy of the KC Report dated October 2, 2012.

7. Attached hereto as “Exhibit F” is a true and correct copy of select pages from the Deposition of Chad Kramer, (Kramer Depo.) 40:11-16.
8. Attached hereto as “Exhibit G” is a true and correct copy of an excerpt from the Deposition of Derek Matthies, (Matthies Depo) 62:8-18.
9. Attached hereto as “Exhibit H” is a true and correct copy of the ESI report dated May 11, 2015.
10. Attached hereto as “Exhibit I” is a true and correct copy of the Nohr Report dated March 3, 2015.
11. Attached hereto as “Exhibit J” are true and correct copies of select portions of the transcript cited in the brief of the Deposition of John W. Carson, Ph.D., dated October 27, 2017. Carson Depo. 24:1-3; 23:3-5; 6:2-4; 23:1-5; 27:5-11; 41:18-25; 42:1-13; 42:20-25; 43:1; 24:1-3; 53:6-12; 61:23-25; 62:1-11; 73:8-14; 69:1-25; 76; 77:1-25; 78:1-25; 79:1-25; 80:1-25; 43:5-8; 31:1-5; 26:25; 27:1-2; 37:14-25; 38:1-8; 41:24-25; 42:1-13; 31:1-5; 31:2-4; and 80:5-6.
12. Attached hereto as “Exhibit K” is a true and correct copy of the *ANSI/ASAE EP433 - Loads Exerted by Free-Flowing Grain on Bins (1998)*, ‘EP 433; 4.1.1.4.’
13. Attached hereto as “Exhibit L” is a true and correct copy of select portions of the Deposition of Jason O’Mara, O’Mara Depo. 69:4-6; 88:18-23.
14. Attached hereto as “Exhibit M” is a true and correct copy of the National Society of Professional Engineers (“NSPE”) Code of Ethics for Engineers, Rule 4.02915.
15. Attached hereto as “Exhibit N” is a true and correct copy of the Supplemental Report of John W. Carson, Ph.D., December 1, 2016.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated this 16th day of March, 2018.

GOODSELL QUINN, LLP

BY:

G. Verne Goodsell

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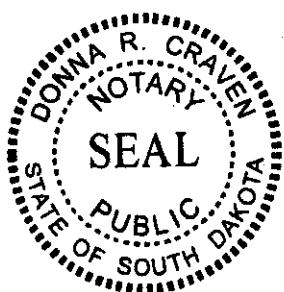
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verne@goodsellquinn.com

Subscribed and sworn to before me this 16th day of March, 2018.

Donna R. Craven
Notary Public, South Dakota

My Commission Expires: My Commission Expires
October 15, 2019
(Seal)



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of March, 2018, a true and correct copy of the *Affidavit of G. Verne Goodsell in Support of Plaintiff's Brief in Support of Motion to Strike Causation Opinion of John W. Carson* was electronically filed and served through Odyssey File and Serve System to:

Michael F. Tobin
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/*s/ G. Verne Goodsell* -Electronically Filed
G. Verne Goodsell